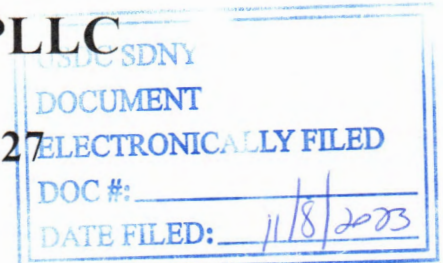


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**November 8, 2023**

**Via ECF**

Hon. Colleen McMahon, USDJ  
United States District Court, SDNY  
500 Pearl St.  
New York, NY 10007-1312

**Re: Richards v. Mainstream Electric, Inc. et al**  
**Case No. 22-CV-04482 (CM)**  
**Motion for Extension of Time**

Dear Judge McMahon:

My firm represents plaintiff in the above-referenced action. On October 11, 2023, the mediation office assigned a mediator in this matter. On October 30, 2023, Defendants New York City School Construction Authority ("SCA"), and The City of New York ("NYC")(collectively "City Defendants"), filed a motion to dismiss. After conferring with counsel for City Defendants, we have agreed, and it is hereby respectfully requested, that this Honorable Court extend Plaintiff's time to respond to said motion to two weeks after the completion of mediation in this matter and provide City Defendants with 30 days to file a reply to Plaintiff's opposition. One of the main reasons for this request is that mediation may result in a settlement of the case and may obviate the need for further litigation and motion practice. No prior request for an extension of this deadline was made.

I thank the Court in advance for its time and consideration.

Respectfully submitted,

Abdul Hassan Law Group, PLLC

/s/ Abdul Hassan

By: Abdul K. Hassan, Esq. (AH6510) - Counsel for Plaintiff

cc: Defense Counsels via ECF